



## State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.  
Commissioner

Mr. Cristopher Anderson  
Director Environmental Affairs  
L.E. Carpenter & Company  
Suite 36-5000  
200 Public Square  
Cleveland, OH 44114-2304

AUG 01 2000

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site  
Wharton, Morris County  
Free Product Volume Analysis

The New Jersey Department of Environmental Protection (Department) and EPA have reviewed the letter entitled Free Product Volume Analysis dated May 2000 and have the following comments:

### Department's Comment

1. The document indicates that ground water flow is from the Rockaway River toward the drainage ditch. If this is the case, LNAPL product or dissolved product should have been detected in the drainage ditch surface water since the product zone lies between the river and the ditch. Please explain.

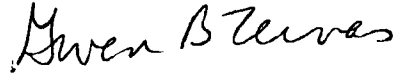
### EPA's Comment

2. The calculations in the report appear to follow the prescribed estimation methods, and the 44,000 gallons of free product arrived at is probably the most accurate estimate made to date of the amount of LNAPL present. Even though there could be a large margin of error associated with this number, as stated, it is clear that the current rate of LNAPL recovery is grossly inadequate and needs to be augmented. Moreover, the 20% to 30% recovery rate mentioned is also a gross assumption, and would only apply to the currently operating technology. Therefore, as pointed out in the report, the estimates and conclusions have large error bars associated with them, and ultimately must be considered accordingly.



If you have any questions, please contact me at (609) 633-7261.

Sincerely,

A handwritten signature in cursive script that reads "Gwen B. Zervas".

Gwen B. Zervas, P.E.  
Case Manager  
Bureau of Case Management

C: Stephen Cipot, EPA  
Nicholas Clevett, RMT  
George Blyskun, BGWPA  
John Prendergast, BEERA